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August 29, 2022

**Via PACER and**

**Email:** [chambers\\_of\\_jks@njb.uscourts.gov](mailto:chambers_of_jks@njb.uscourts.gov)

Honorable John K. Sherwood, U.S.B.J.  
United States Bankruptcy Court  
50 Walnut Street, 3rd Floor  
Newark, NJ 07102

Re: Cherry Street Capital 113-27, LLC  
Case No. 22-14539-JKS, Chapter 11  
Motion Return Date: August 30, 2022

Dear Judge Sherwood:

This firm represents secured creditor, IPFS Corporation ("IPFS"), in the above matter. IPFS has filed a Motion for Stay Relief, which presently is returnable before Your Honor, tomorrow, August 30, 2022 at 10:00 a.m. I am writing to request that IPFS' motion be carried for two weeks to **September 13, 2022 at 10:00 a.m.** The adjournment will give counsel for Debtor and me time to continue discussing a mutually acceptable resolution of the motion. This request is made with the consent of Debtor's counsel.

Thank you for your courtesies and assistance in this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'J. Gallagher', is written over the typed name 'Jerome F. Gallagher, Jr.'.

Jerome F. Gallagher, Jr.

JFG:ds

cc: S. Jason Teele, Esq. – via PACER and email: [steele@sillscummis.com](mailto:steele@sillscummis.com)



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